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1911-1974

November 19, 1997

* ALSO LICENSED IN GEORGIA #ALSO LICENSED IN ALABAMA + ALSO LICENSED IN ARIZONA

VIA FEDERAL EXPRESS

Mr. K. David Waddell Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37238

Application of Electric Power Board of Chattanooga for

a Certificate of Public Convenience and Necessity

Docket No. 97-07488

Dear Mr. Waddell:

We are enclosing for filing an original and thirteen (13) copies of a Motion for Extension of Time in the above-referenced matter.

Thank you for your assistance in this matter.

Sincerely,

Mark W. Smith For the Firm

Enclosures

Mr. Russell Gill (w/enc.)

Parties of Record

73911

BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

IN RE:

APPLICATION OF ELECTRIC POWER BOARD OF CHATTANOOGA FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO PROVIDE INTRASTATE TELECOMMUNICATIONS SERVICES

Docket No. $97 - 07\hat{4}$

MOTION FOR EXTENSION OF TIME

Comes the Electric Power Board of Chattanooga ("EPB"), by and through counsel, and moves the Tennessee Regulatory Authority (the "Authority") to extend the time for EPB's response to data requests of the Authority's staff and for the Authority's hearing of EPB's Application for a Certificate of Public Convenience and Necessity (the "Application") to become a competing telecommunications service provider. In support of this Motion, EPB states as follows:

- 1. On October 21, 1997, EPB filed the Application with the Authority.
- 2. On November 3, 1997, the Authority issued its Notice of Hearing scheduling the hearing on the Application for December 2, 1997.
- 3. On November 7, 1997, Mr. Russell Gill of the Authority's Telecommunications Division propounded a set of data requests to EPB concerning matters raised in the Application, which responses are due on November 21, 1997.
- 4. EPB respectfully requests that it be granted until December 10 to respond to the Authority's data requests and that

the Authority reschedule the hearing on the Application on a convenient hearing date on or after January 14, 1998.

WHEREFORE, EPB prays:

- 1. That it be permitted through and until December 10, 1997 to respond to the Authority's data requests; and
- 2. That the Authority reschedule the hearing on the Application on a convenient hearing date on or after January 14, 1998.

Respectfully submitted,

STRANG, FLETCHER, CARRIGER, WALKER, HODGE & SMITH, PLLC

By:

Carlos C. Smith
William C. Carriger

Mark W. Smith

400 Krystal Building

One Union Square

Chattanooga, Tennessee 37402 Attorneys for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and exact copy of the within and foregoing Application on behalf of the Electric Power Board of Chattanooga, via United States mail, first class postage prepared and properly addressed to the following:

Guy M. Hicks, General Counsel BellSouth Communications, Inc. 333 Commerce Street Suite 2101 Nashville, TN 37201-3300

Val Sanford, Esquire Gullett, Sanford, Robinson & Martin P.O. Box 198888 Nashville, TN 37219-8888

Charles B. Welch, Jr. Farris, Mathews, Gilman, Branan & Hellen, P.L.C. 2400 Nashville City Center 511 Union Street Nashville, TN 37219

This ______ day of November, 199

Strang, Fletcher, Carriger, Walker Hodge & Smith, PLLC

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